

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

MASTER CASE NO. C09-037 MJP

**DECLARATION OF MATTHEW S.
JACKSON IN SUPPORT OF
DEFENDANTS' REPLY IN FURTHER
SUPPORT OF THEIR MOTION TO
EXCLUDE THE PROFFERED EXPERT
TESTIMONY OF CHARLES D. COWAN
AND IRA HOLT**

I, MATTHEW S. JACKSON, hereby declare as follows under penalty of perjury
pursuant to 28 U.S.C. § 1746:

1. I am an attorney at law licensed to practice in the State of Illinois. I am
associated with the firm of Sidley Austin LLP, counsel for non-party JPMorgan Chase Bank,
N.A. ("JPMC"). By virtue of my representation of JPMC, I have personal knowledge of the
facts set forth below, or knowledge based on information and belief, and could and would
testify competently to those facts if called to do so.

*Declaration of Matthew S. Jackson in Support of
Defendants' Reply in Further Support of Their Motion
to Exclude the Proffered Expert Testimony of Charles D.
Cowan and Ira Holt: (CV09-037 MJP)*

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2. In connection with my representation of JPMC, I participated in and oversaw JPMC's production of documents in response to a subpoena from the Plaintiffs in the above-captioned matter. Among other things, that production included the electronic loan origination files for loans underlying the securitizations at issue in this matter. I have reviewed numerous examples of those electronic loan files and am therefore generally familiar with their contents and characteristics.

3. JPMC produced those files in a format that contains optical character recognition ("OCR") data, which means that the loan files are text-searchable. The loan files were also produced with numerous fields of metadata, one of which allows a user to locate all of the documents associated with a particular loan by running a search for the relevant loan number in the "Loan number" field.

EXECUTED this 6th day of June, 2012, at Chicago, Illinois.

By: Matthew S. Jackson

Matthew S. Jackson

Declaration of Matthew S. Jackson in Support of Defendants' Reply in Further Support of Their Motion to Exclude the Proffered Expert Testimony of Charles D. Cowan and Ira Holt: (CV09-037 MJP)

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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10 DATED this 8th day of June, 2012 at Seattle, Washington.

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